

I think the idea of allowing AM station to use FM translators is an idea that is way past due. I have read many comments and back most of them. However I would like to suggest another modification. I operate an LPFM station. This station serves a small town that has only one other station, a full time AM that runs at very low power at night. I lack staff to provide the same level of professionalism as the staff at the AM station in town.

My station provides a lot of entertainment and information for specific portions of our community and we intend to continue to do that. However we think we should have the flexibility to rebroadcast the signal of the LOCAL AM station when conditions warrant. For instance in the early morning hours the coverage of the local AM is very bad but they have a great staff doing important things. We think as a small LPFM in the SAME community we should be able to rebroadcast their morning show when they are in limited coverage. The same could be said for night service when we feel they have some programming that we would want carried on our air.

As it stands now this station uses some of our programming during the day as they ARE allowed to retransmit our signal with our permission. But we feel it should be the other way around as well.

I realize that many chances for abuse exist in permitting LPFM stations to transmit AM stations. We do not endorse LPFM station becoming de facto translators but we do support the flexibility to allow such operation when desired by both stations.

The main point to consider is if both stations serve the same area. We would suggest the Commission allow retransmission in both directions of an LPFM station and commercial AM station if the AM station City of License and the LPFM station City of License are the same and/or if the 5 millivolt contour of the AM station completely covers the 60 dbu contour of the LPFM station.

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